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16 || *Counsel for Lead Plaintiff Bradley Sostack*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH

This Document Relates to:

All Actions

**LEAD PLAINTIFF'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
MATERIALS RELATING TO LEAD
PLAINTIFF'S REPLY IN SUPPORT OF
HIS MOTION TO COMPEL
PRODUCTION OF DOCUMENTS AND
PRIVILEGE LOG**

1 Pursuant to Civil Local Rules 7-11 and 79-5(e), and §§ 7(C) and 7(D) of the parties'
 2 Stipulated Protective Order as Modified by the Court, ECF No. 120, Lead Plaintiff Bradley
 3 Sostack moves this Court to file under seal the following documents related to Lead Plaintiff's
 4 Reply in Support of His Motion to Compel Production of Documents and Privilege Log. Plaintiff
 5 seeks to seal portions of its brief and its accompanying declaration and exhibits based on
 6 confidentiality designations made by Defendants. Plaintiff takes no position concerning whether
 7 there is good cause to seal these documents.

8

9 Documents to be Filed Under Seal	10 Line Nos. to be Redacted / 11 Sealed in Full
12 Portions of Lead Plaintiff's Reply in Support of His Motion to 13 Compel Production of Documents and Privilege Log	14 6:15-17 6:25-28 7:1-5
15 Burningham Decl. Exhibit 1 (RPLI_00302981)	16 Sealed in Full
17 Burningham Decl. Exhibit 2 (RPLI_00302989)	18 Sealed in Full
19 Burningham Decl. Exhibit 3 (RPLI_00303004)	20 Sealed in Full
21 Burningham Decl. Exhibit 4 (RPLI_00303011)	22 Sealed in Full
23 Burningham Decl. Exhibit 5 (RPLI_00303032)	24 Sealed in Full

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26 The documents above contain and describe information that has been designated by
 27 Defendants as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the
 28 parties' Stipulated Protective Order. *See* ECF No. 120 at §§ 2(B), 2(G). Pursuant to Civil L.R.
 79-5(d)(1)(A)–(D), filed herewith are the following:

29

- 30 (1) the Declaration of P. Ryan Burningham in support of this motion;
- 31 (2) a proposed order;
- 32 (3) unredacted versions of the documents listed above; and
- 33 (4) a redacted version of the reply brief.

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Plaintiff respectfully requests that, if the Court finds good cause, it enter the attached proposed order.

Dated: March 1, 2021

SUSMAN GODFREY L.L.P.

By: /s/ *P. Ryan Burningham*

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Counsel for Lead Plaintiff Bradley Sostack

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2021, I electronically filed the foregoing document with the clerk of the Court and served counsel of record via the CM/ECF system.

/s/ P. Ryan Burningham

P. Ryan Burningham